

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) Cause No. 1:08-cr-04-SEB-KPF
)
DALE RUSSELL,)
Defendant.)

FILED
MAR 01 2010
U.S. DISTRICT COURT
INDIANAPOLIS, INDIANA

DEFENDANT'S TENDERED VOIR DIRE QUESTIONS

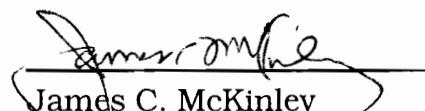
Defendant Dale Russell, by counsel, respectfully moves the Court to make the following inquiry of the prospective jurors:

1. The nature of any moral, religious or personal objections the prospective juror may have to the display of:
 - a. sexually explicit material;
 - b. depictions of full frontal nudity;
 - c. depictions of nudity in children.
2. Whether the juror's moral, religious or personal beliefs would interfere with his/her ability to:
 - a. view sexually explicit material;
 - b. discuss the nature of such material with fellow jurors, including those of the opposite sex; and
 - c. consider such material with an open mind.
3. Whether any juror, the juror's family or close friends have ever been the victim of a sexual offense. If so, what impact does have on the juror's ability to fairly

consider the evidence in this case?

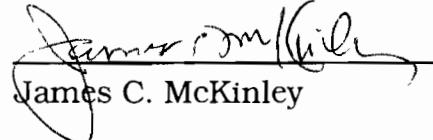
4. The nature or any information and/or publicity to which the juror has been exposed regarding sexually explicit material and/or alleged child pornography.
5. What periodicals or newspapers, if any, does the juror commonly read.

Respectfully submitted,


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CERTIFICATE OF SERVICE

The foregoing was hand delivered to Asst. U.S. Attorneys Gayle Helart and Brant Cook this 1st day of March, 2010.


James C. McKinley